

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Court
Southern District of Texas
FILED

AUG 13 2019

David J. Bradley, Clerk of Court

United States of America
v.
VOLTAIRE TABOT LARCHE aka
IBRAHIM BAH

Case No.

H19-1498M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/14/2018 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. Sec. 1543

Passport Fraud

This criminal complaint is based on these facts:

See Attached Affidavit of U.S.S.S. Special Agent Christopher Dozier

☒ Continued on the attached sheet.


Complainant's signature

U.S.S.S. Special Agent Christopher Dozier

Printed name and title

Sworn to before me and signed in my presence.

Date:

August 13, 2019

City and state: Houston, Texas


Judge's signature

U.S. Magistrate Judge Frances H. Stacy

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. Affiant, United States Secret Service Special Agent Christopher Dozier, has been employed by the U.S. Secret Service since July 2018. Affiant is currently assigned to the Houston Field Office Fraud Strike Force Team assisting United States Postal Inspector Matthew Boyden. Prior to that, Affiant served as a State Trooper for the Texas Department of Public Safety. Affiant has completed over 4,000 Texas Commission on Law Enforcement continuing education hours along with over ten years of law enforcement experience. Affiant has received training in financial related crimes at the Federal Law Enforcement Training Center and the United States Secret Service Special Agent Training Center. Affiant has attended training in the areas of counterfeit, check fraud, credit card fraud, identity theft, bank fraud, wire fraud and mail fraud. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against **Voltaire Tabot Larche**, also known as **Ibrahim Bah**.
2. The information set forth in this Affidavit is based upon your Affiant's personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. The Affiant is assisting United States Postal Inspector Matthew Boyden with this investigation. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **Larche, Voltaire Tabot** has committed violations of federal law.
3. Postal Inspectors and Agents have been investigating numerous Business E-mail Compromise (BEC) complaints. The Federal Bureau of Investigation defines BEC fraud as a sophisticated fraud scam targeting businesses and individuals that regularly perform wire transfer payments. The scam is carried out by compromising legitimate business e-mail accounts through social engineering or computer intrusion techniques to conduct unauthorized transfers of funds. Most victims report using wire transfers as a common method of transferring funds for business purposes; however, some victims report using checks as a common method of payment. The fraudsters will use the method most commonly associated with their victim's normal business practices. Affiant has identified numerous bank accounts opened with counterfeit passports in and around Houston that are being funded with fraudulent BEC wire transfers. All of these wires involve the use of interstate wire communications facilities. Several of the fraudulent accounts are also used to receive funds from victims of other types of fraud (romance fraud, check fraud, internet sales fraud, and check fraud). The counterfeit passports are used in an attempt to conceal the true identity of the individual opening the bank accounts and receiving money stolen from victims.

4. Agents spoke with First National Bank Texas fraud investigator Renee Thilman and learned that on or about 04/14/2018, an individual (later identified as **Voltaire Tabot Larche**) used a counterfeit Republic of Sierra Leone passport #ER002938 in the name Ibrahim Bah to open bank account # 473235828 and 471238881. The counterfeit passport contained the photograph of **Voltaire Tabot Larche**. The individual listed an address of 13350 Westheimer Rd. #335, Houston, Harris County, Texas 77077. The account holder listed telephone number (832) 949-7250 and (346) 319-0870. Bank personnel took a photograph of the person opening the bank account with the counterfeit Sierra Leone passport.
5. Agents spoke with Woodforest National Bank fraud investigator Lisa Purtell and learned that on or about 06/06/2018, the same individual used the same counterfeit Republic of Sierra Leone passport #ER002938 in the name Ibrahim Bah to open bank account #1329002065 in the business name Kayshankee Investments. The individual listed the address of 14515 Briar Forest Dr. #118, Houston, Harris County, Texas 77077. The individual listed telephone number (281) 864-8625. The account holder also presented a Ft. Bend County (Texas) assumed name certificate for Kayshankee Investments.
6. Agents spoke with Chase Bank fraud investigator Leslie Jordan and learned that on or about 06/08/2018, the same individual used the same counterfeit Republic of Sierra Leone passport #ER002938 in the name Ibrahim Bah to open bank account #292093553 in the business name Kayshankee Investments. The individual listed the same address of 13350 Westheimer Rd. #335, Houston, Harris County, Texas 77077 as well as a second address of 14515 Briar Forest Dr. #118, Houston, Harris County, Texas 77077.
7. Agents provided Special Agent Katherine Langston, Department of State, Diplomatic Security Service, with copies of a copy of the Sierra Leone passport #ER002938 in the name Ibrahim Bah. Diplomatic Security agents in the United States and overseas investigate passport and visa fraud. As the Department of State's law enforcement and security arm, the Bureau of Diplomatic Security is charged with ensuring the integrity of U.S. travel documents. SA Langston reviewed copies of the passport and advised Affiant they were not legitimate or valid passports. There are no records in any United States database regarding these passports, a U.S. visa issued for these names/passports, and no entry/exit records into the United States.
8. Based on account activity, the addresses used, and information provided by accomplices, **VOLTAIRE TABOT LARCHE** was developed as the person using the Ibrahim Bah passport. On 11/28/18, Inspector Boyden interviewed a defendant in a federal case who was charged with using fraudulent passports in a scheme identical to the one alleged in this complaint. Furthermore, the defendant was directly involved in sending or receiving money to the fraudulent Ibrahim Bah accounts. The defendant has been sentenced and is currently in federal prison. That defendant identified **VOLTAIRE**

LARCHE as the person using the Ibrahim Bah passport. The cooperator has known **LARCHE** for an extended period of time and participated with his in committing fraud.

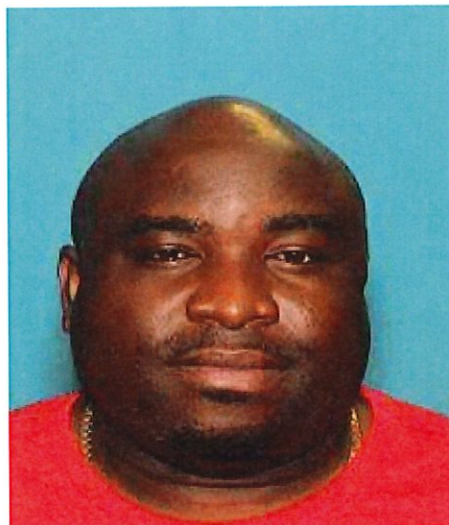
9. Agents obtained and reviewed photographs of **VOLTAIRE LARCHE** as well as bank surveillance photographs of Ibrahim Bah. The following is a side-by-side comparison of Bah photograph from First National Bank and Larche photograph from first National Bank. A Copy of Larche Texas Department of Public Safety Driver's License Photograph is attached below.



Ibrahim Bah – 1st National Bank Texas/ 1st Convenience Bank
National Bank Texas / 1st Convenience Bank



Voltaire Tabot Larche- 1st



Voltaire Larche- current Texas Department of Public Safety Driver's License Photograph

10. Agents have obtained and reviewed the bank records associated with all three fraudulent accounts. In addition, Agents have obtained historical bank records from accounts opened by **VOLATIRE LARCHE** in his true name. Agents have reviewed financial reporting databases, which outline the account activity of several of the fraudulent accounts. At this point Affiant has identified in excess of

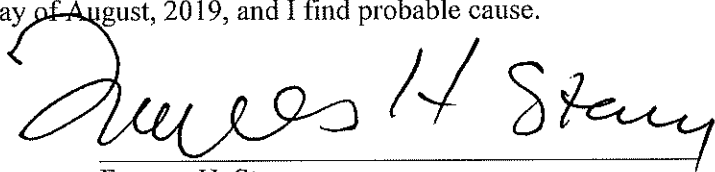
\$1,000,000 (1 million) in deposits stolen from victims that were made to the aforementioned fraudulent accounts opened by Ibrahim Bah/Voltaire Larche. Additional losses are expected.

11. Affiant spoke with fraud victim William Winderweedle Jr. who stated he received an email requesting a "wire" transfer of \$206,926 from whom he believed was one of his real estate clients (email) in July 2018. Winderweedle Jr. transferred the money into the account requested and was later contacted by Chase Bank Fraud Investigators concerning the transaction on July 5 2018. Winderweedle Jr. stated that he did not authorize the listed dollar amount to be transferred (deposited) into JPMC bank account # 292093553 for the benefit of Kayshankee Investments. Winderweedle stated that due to the BEC fraud, he lost the \$206,926. Affiant has obtained and reviewed other fraud complaints which indicate **LARCHE** used the accounts he opened to receive funds stolen from victims of BEC and other types of fraud.
12. Based upon the above, the undersigned believes there is probable cause to believe that **Larche, Voltaire Tabot** also known as **Bah, Ibrahim** has committed crimes in violation of Title 18, United States Code, Sections 371 (Conspiracy) and 1543 (Passport Fraud).

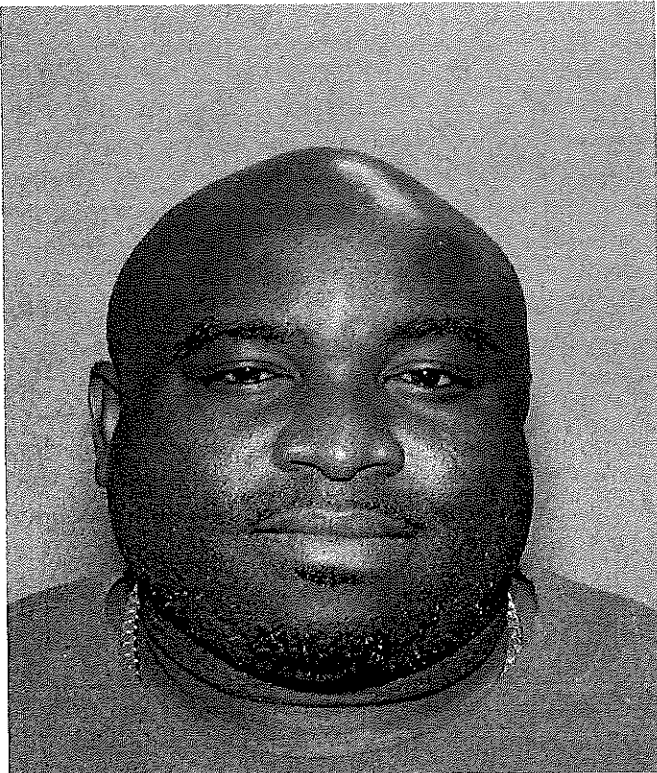


Christopher Dozier
Special Agent
United States Secret Service

Sworn and Subscribed to me this 13 day of August, 2019, and I find probable cause.



Frances H. Stacy
United States Magistrate Judge
Southern District of Texas

DL Number:	[REDACTED]		
Name:	VOLTAIRE TABOT LARCHE		
Date of Birth:	[REDACTED]		
Photo:			
Address:	[REDACTED] HOUSTON, TX 77082		
Race:	BLACK	Sex:	M
Height:	504	Weight:	190
Eye Color:	BROWN	Hair Color:	BLACK
Image Date:	06012017	Class:	C
Expiration Date:	09182023	Restriction:	
CDL Flag:	N	Endorsement:	

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